

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAFAEL OJEDA,  
a/k/a "Papi,"  
CALVIN OJEDA,  
a/k/a "Killa,"  
JONATHAN OJEDA,  
a/k/a "Shorty,"  
a/k/a "Chorty,"  
SERVANDO JOSE GOMEZ,  
a/k/a "June,"  
HECTOR TIRADO,  
a/k/a "Hec,"  
TRAVIS PROFIT,  
a/k/a "Trap,"  
ANGEL SEPULVEDA,  
a/k/a "A-Plus,"  
EDUARDO VAZQUEZ,  
a/k/a "Spider,"  
JASON PEREZ,  
a/k/a "Santana,"  
TREVIS BOWENS,  
a/k/a "T-Money,"  
JHOVY DIONIZIO,  
a/k/a "Trouble,"  
CHRISTIAN DUMES,  
a/k/a "Gordo,"  
CHRISTIAN RAMOS,  
a/k/a "Fatboy,"  
PAQUITO RODRIGUEZ,  
a/k/a "Frank,"  
GISETTE RIVERA,  
a/k/a "Maria,"  
SAMUEL PALMER,  
a/k/a "Juju,"  
JOSE COLON,  
a/k/a "Chang,"  
ANTOINE HENDERSON,  
a/k/a "Will,"

INDICTMENT

S1 15 Cr. 487 (GBD)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DATE FILED: MAR 16 2016

ADRIEL PONCE,  
a/k/a "A,"  
CHRISTOPHER RICHARDSON,  
a/k/a "C,"  
ROBERT MATOS,  
a/k/a "Rob,"  
a/k/a "Smooth Baller,"  
DARIEL ALVAREZ,  
a/k/a "Dynasty,"  
a/k/a, "D,"  
LOUIS DAVILA,  
a/k/a "Bam,"  
a/k/a "Bam Bam,"  
WILBERT LEWIS,  
a/k/a "Lil Bill,"  
a/k/a "LB," and  
DWIGHT ANDERSON,  
a/k/a "Munda,"

Defendants.

COUNT ONE  
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2003, up to and including in or about 2016, in the Southern District of New York and elsewhere, RAFAEL OJEDA, a/k/a "Papi," CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," HECTOR TIRADO, a/k/a "Hec," TRAVIS PROFIT, a/k/a "Trap," ANGEL SEPULVEDA, a/k/a "A-Plus," EDUARDO VAZQUEZ, a/k/a "Spider," JASON PEREZ, a/k/a "Santana," TREVIS BOWENS, a/k/a "T-Money," JHOVY DIONIZIO, a/k/a "Trouble," CHRISTIAN DUMES, a/k/a "Gordo," CHRISTIAN RAMOS, a/k/a "Fatboy," PAQUITO RODRIGUEZ, a/k/a "Frank," GISETTE RIVERA, a/k/a "Maria," SAMUEL PALMER, a/k/a "Junior," JOSE COLON,

a/k/a "Chang," ANTOINE HENDERSON, a/k/a "Will," ADRIEL PONCE, a/k/a "A," CHRISTOPHER RICHARDSON, a/k/a "C," ROBERT MATOS, a/k/a "Rob," a/k/a "Smooth Baller," DARIEL ALVAREZ, a/k/a "Dynasty," a/k/a, "D," LOUIS DAVILA, a/k/a "Bam," a/k/a "Bam Bam," WILBERT LEWIS, a/k/a "Lil Bill," a/k/a "LB," and DWIGHT ANDERSON, a/k/a "Munda," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RAFAEL OJEDA, CALVIN OJEDA, JONATHAN OJEDA, GOMEZ, TIRADO, PROFIT, SEPULVEDA, VAZQUEZ, PEREZ, BOWENS, DIONIZIO, DUMES, RAMOS, RODRIGUEZ, RIVERA, PALMER, COLON, HENDERSON, PONCE, RICHARDSON, MATOS, ALVAREZ, DAVILA, LEWIS, and ANDERSON, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that RAFAEL OJEDA, CALVIN OJEDA, JONATHAN OJEDA, GOMEZ, TIRADO, PROFIT, SEPULVEDA, VAZQUEZ, PEREZ, BOWENS, DIONIZIO, DUMES, RAMOS, RODRIGUEZ, RIVERA, PALMER, COLON, HENDERSON, PONCE, RICHARDSON, MATOS, ALVAREZ, DAVILA, LEWIS, and ANDERSON, the defendants, conspired to distribute and possess with the intent to distribute were (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A), and (b) 280

grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b) (1) (A).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
**(Firearms)**

The Grand Jury further charges:

4. From at least in or about 2003, up to and including in or about 2016, in the Southern District of New York and elsewhere, CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," TRAVIS PROFIT, a/k/a "Trap," EDUARDO VAZQUEZ, a/k/a "Spider," JASON PEREZ, a/k/a "Santana," CHRISTIAN DUMES, a/k/a "Gordo," CHRISTIAN RAMOS, a/k/a "Fatboy," HECTOR TIRADO, a/k/a "Hec," CHRISTOPHER RICHARDSON, a/k/a "C," ANGELA SEPULVEDA, a/k/a "A-Plus," JOSE COLON, a/k/a "Chang," ROBERT MATOS, a/k/a "Rob," a/k/a "Smooth Baller," DARIEL ALVAREZ, a/k/a "Dynasty," a/k/a, "D," LOUIS DAVILA, a/k/a "Bam," a/k/a "Bam Bam," WILBERT LEWIS, a/k/a "Lil Bill," a/k/a "LB," and DWIGHT ANDERSON, a/k/a "Munda," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, to wit,

handguns and a shotgun, some of which were brandished and discharged.

(Title 18, United States Code,  
Sections 924(c)(1)(A)(i), (ii), and (iii), and 2.)

**FORFEITURE ALLEGATION AS TO COUNT ONE**

5. As a result of committing the narcotics offense charged in Count One of this Indictment, RAFAEL OJEDA, a/k/a "Papi," CALVIN OJEDA, a/k/a "Killa," JONATHAN OJEDA, a/k/a "Shorty," a/k/a "Chorty," SERVANDO JOSE GOMEZ, a/k/a "June," HECTOR TIRADO, a/k/a "Hec," TRAVIS PROFIT, a/k/a "Trap," ANGEL SEPULVEDA, a/k/a "A-Plus," EDUARDO VAZQUEZ, a/k/a "Spider," JASON PEREZ, a/k/a "Santana," TREVIS BOWENS, a/k/a "T-Money," JHOVY DIONIZIO, a/k/a "Trouble," CHRISTIAN DUMES, a/k/a "Gordo," CHRISTIAN RAMOS, a/k/a "Fatboy," PAQUITO RODRIGUEZ, a/k/a "Frank," GISSETTE RIVERA, a/k/a "Maria," SAMUEL PALMER, a/k/a "Junior," JOSE COLON, a/k/a "Chang," ANTOINE HENDERSON, a/k/a "Will," ADRIEL PONCE, a/k/a "A," CHRISTOPHER RICHARDSON, a/k/a "C," ROBER MATOS, a/k/a "Rob," a/k/a "Smooth Baller," DARIEL ALVAREZ, a/k/a "Dynasty," a/k/a, "D," LOUIS DAVILA, a/k/a "Bam," a/k/a "Bam Bam," WILBERT LEWIS, a/k/a "Lil Bill," a/k/a "LB," and DWIGHT ANDERSON, a/k/a "Munda," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting and derived from any proceeds the defendants obtained directly or indirectly as a result of the offense and any and all property used or intended to

be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

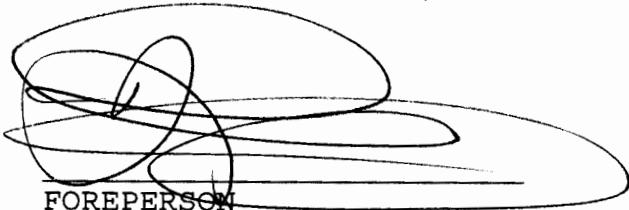
**Substitute Assets Provision**

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 21, United States Code, Section 853.)



  
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PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAFAEL OJEDA, a/k/a "Papi," et al.,

Defendants.

INDICTMENT

S1 15 Cr. 487

(21 U.S.C. § 846 and  
18 U.S.C. §§ 924(c)(1)(A)(i), (ii),  
and (iii), and 2.)

PREET BHARARA

United States Attorney.

TRUE BILL

FOREPERSON

3/16/16 Pd. Morsky Ind. Mrs. Puff. Morsky